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April 3, 2024

VIA ECF

Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Trustees of the New York City District Council of Carpenters Pension Fund, et al.*
v. Mark Furer & Henli Benjamin
Case No. 1:24-cv-00063-AT

Dear Judge Torres:

This Firm represents Defendant Mark Furer in the matter captioned above.¹ We write to respectfully request an extension of the parties' current deadline to file a joint letter and proposed case management plan.

By Order dated March 13, 2024, the Court directed the parties to file a joint letter and proposed case management plan by today, April 3, 2024. (ECF No. 12). We were engaged by Mr. Furer yesterday in this matter and need additional time to evaluate the allegations in the Complaint prior to coordinating on a joint proposed case management plan for the Court's consideration. In addition, we have been informed that Defendant Henli Benjamin has recently sought protection under Chapter 7 of the Bankruptcy Code. Ms. Benjamin's Bankruptcy Petition was filed on March 22, 2024 in the U.S. Bankruptcy Court for the Eastern District of New York, Case No. 1-24-41222. We also need additional time to assess the impact of Ms. Benjamin's Bankruptcy Petition on the claims in this action.

We accordingly request a 30-day extension of the current deadline to submit a proposed case management plan. This is the first request for an extension of time by either of Defendants and Plaintiff's counsel consents to this request. The requested extension will not affect any other currently scheduled dates. In the interim, and in conjunction with our evaluation of the impact

¹ Defendant Furer does not, herein, waive any rights, defenses, or arguments, including but not limited to, those based upon lack of personal jurisdiction and improper service.

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Ms. Benjamin's bankruptcy proceeding may have on this case, we will coordinate with Plaintiff's counsel on the current status of the pleadings.

We thank the Court for its consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jessica Giambrone Palmese', with a horizontal line extending to the right.

Jessica Giambrone Palmese

cc: Adrianna Grancio, Esq. (*via* ECF)
Asher B. White, Esq., Bankruptcy Counsel for Henli Benjamin (*via* email)
John E. B. Gerth, Esq. (*via* email)

GRANTED. The parties shall file their joint letter and proposed case management plan by **May 3, 2024**.

SO ORDERED.

Dated: April 4, 2024
New York, New York

A handwritten signature in black ink, appearing to read 'Analisa Torres', with a horizontal line extending to the right.

ANALISA TORRES
United States District Judge